

DOCKET FILE COPY ORIGINAL
EX PARTE OR LATE FILED

1201 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-3919
(202) 789-3400
FAX (202) 789-1158

KECK, MAHIN & CATE

FILE NUMBER 46158-003(B)

DIRECT DIAL (202) 789-3419

RECEIVED

AUG 19 1993

August 19, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Mr. William F. Canton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

NOTICE OF WRITTEN
EX PARTE PRESENTATION

Re: RM 8181 - Notice Of Written Ex-Parte Communication

Dear Mr. Canton:

Enclosed are two copies of a written Ex Parte communication transmitted to Olga Madruga Forti in the above referenced docket.

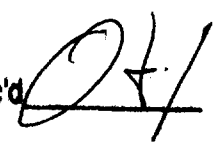
Sincerely,



Albert H. Kramer

AHK:rw
Enclosures

No. of Copies rec'd
List A B C D E



A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

CHICAGO, ILLINOIS HOUSTON, TEXAS LOS ANGELES, CALIFORNIA SAN FRANCISCO, CALIFORNIA
PEORIA, ILLINOIS OAKBROOK TERRACE, ILLINOIS SCHAUMBURG, ILLINOIS
KECK, MAHIN, CATE & KOETHER NEW YORK, NEW YORK FAR HILLS, NEW JERSEY

EX PARTE OR LATE FILED

1201 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-3919
(202) 789-3400
FAX (202) 789-1158

KECK, MAHIN & CATE

FILE NUMBER 46158-003

DIRECT DIAL (202) 789-3419

RECEIVED

AUG 19 1993

August 19, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

By Messenger

Olga Madruga Forti
Chief, Domestic Services Branch
Domestic Facilities Division
Common Carrier Bureau
Federal Communications Commission
Room 6008
2025 M Street, N.W.
Washington, D.C. 20554

Re: In the Matter of the Petition of the Inmate Calling
Services Providers Task Force for Declaratory Ruling; RM
8181

Dear Olga:

The purpose of this letter is to provide the Commission with background information on the competition in the inmate calling services market. As you know, the Inmate Calling Services Providers Task Force ("ICSPTF") of the American Public Communications Council ("APCC") has filed the above-referenced petition for a declaratory ruling that specialized phones for inmate-only services are customer premises equipment ("CPE"), and that certain of the specialized inmate-only services offered by the local exchange carrier ("LECs") are enhanced within the meaning of Computer II¹ and its progeny. In an earlier meeting, you expressed an interest in whether, if the Commission were to consider granting the petition, correctional facilities will enjoy significant

¹ Amendment of Section 64.702, 77 FCC 2d 384 (1980), recon., 84 FCC 2d 50, further recon., 88 FCC 2d 512 (1981), aff'd sub nom., Computer & Communications Industry Association v. FCC, 693 F.2d 198 (D.C. Cir. 1982), cert. denied, 461 U.S. 938 (1983) ("Computer II").

KECK, MAHIN & CATE

Olga Madrugá Forti
August 19, 1993
Page 2

alternative options for inmate calling services.

At the outset, ICSPTF wishes to make clear that LEC threats -- to abandon the inmate-only service market in the absence of being able to retain these operations in the regulated rate base -- are not to be taken seriously.² Concern about the availability of service and the LECs dropping out of a market once services are deregulated has proven repeatedly to be unfounded. Similar concerns were expressed at the time the Commission deregulated CPE. Indeed, the Commission went so far as to issue a ruling allowing the states to require the LECs to be a provider of last resort in the event equipment was not available.³ There is no reported instance of any state utility commission ever having to exercise this power.

Similar concerns were again raised when the Commission was considering imposition of a separate subsidiary requirement on the Bell Operating Companies (BOCs) following the divestiture of the BOCs by AT&T.⁴ In fact, as the Commission is well aware, the period following the imposition of separate subsidiaries was a time of unprecedented, intense competition in the CPE industry, with the BOCs achieving major market shares, even though they began from a position of zero market share and with sales and maintenance forces in disarray as a result of the divestiture. Of course, in the inmate-only situation, the BOCs will not be starting from a

² ICSPTF notes again the inconsistency of the argument that the LECs will abandon the inmate-only market with the LECs' argument that the LECs are not cross-subsidizing inmate-only service. If the services are not being cross-subsidized, there is no reason they would not continue to be offered on a deregulated basis. Intimations by the LECs that they will drop out of this market if the equipment is removed from regulated accounts, if they are accorded any weight at all, should be taken as a validation of the arguments advanced by ICSPTF: the presence of a cross-subsidized competitor in this market is thwarting competition.

³ National Association of Regulatory Utility Commissioners, 53 RR 2nd 1609 (1983).

⁴ Furnishing of Customer Premises Equipment, Enhanced Services, and Cellular Communications Equipment by the Bell Operating Companies, CC Dkt. No. 83-115, 95 FCC 2d 1117 (1984).

KECK, MAHIN & CATE

Olga Madruga Forti
August 19, 1993
Page 3

position of zero market share. Further, they will have in place their entire sales, maintenance and other support infrastructure for continuing to be active in the inmate-only services market. This was not true at the time of the Commission's CPE decisions because AT&T had consolidated all sales of CPE in a single separate subsidiary in the period preceding divestiture.

While ICSPTF thus believes that historical precedents indicate the Commission need not concern itself with the availability of adequate competition,⁵ the Commission need not rely on historical precedent alone. This is because in the current market environment, competition in the inmate calling services market is vigorous and fierce. We have conducted an informal survey of inmate-only calling services providers, inmate-only phone manufacturers and distributors, all of whom have told us that the competition in this market is intense. Although it is impossible to provide an absolute figure on the number of independent inmate calling services providers currently in the market, our survey shows that at a minimum there are between 100-200 independent providers actively pursuing inmate calling services contracts.⁶

⁵ ICSPTF notes that in the period between when the Commission's Computer II Rules were adopted in late 1980 and the announcement of the Divestiture Agreement on January 8, 1992, the staff of the Subcommittee on Telecommunications, Consumer Protection, and Finance of the House Committee on Energy and Commerce issued a report. The report expressed concern about the ability of competitive markets and independent providers of CPE to fill the void that would potentially be left by the Commission's decision to deregulate CPE. See Telecommunications in Transition: Status of Competition in the Telecommunications Industry, Committee Print, 97-V, 97th Cong., 1st Sess. (November 3, 1981). The primary concern of the report was whether there was sufficient manufacturing capacity in the independent sector of the industry to compete effectively with AT&T. While the Committee's concerns turned out to be unwarranted, there can, in any event be no such concerns in connection with the removal of inmate-only equipment sought by the ICSPTF, since the BOCs are already prohibited from manufacturing under the terms of the divestiture decree.

⁶ The intense competition in this market is one of the reasons we are unable to provide an exhaustive number of the non-LEC service providers. Most of the manufacturers with whom we spoke would not release their distribution lists due to competitive concerns. Moreover, certain independent providers cater to smaller

KECK, MAHIN & CATE

Olga Madruga Forti
August 19, 1993
Page 4

Most of these independent providers are active in multiple states or territories.

In addition to the already intense competition between these independent providers, the large interexchange carriers (IXCs), such as AT&T, MCI, Sprint, LDSS and Opticom, are aggressively pursuing and obtaining inmate services contracts at a rapid pace. A recent edition of some trade publications, for example, shows a sampling of the marketing efforts some of these IXCs employ. (See Exhibit 1.)

Moreover, these IXCs and the other independent providers often provide inmate calling services for smaller, rural correctional facilities in addition to the inmate calling services they provide in the larger markets. For example, MCI recently won Virginia's state-wide bid for inmate calling services under which it will provide it services at several rural correctional facilities. Other independent providers serve numerous out-of-the-way facilities located in the likes of Moundsville, West Virginia, and Susanville, California.

Indeed, independent providers frequently play an important public interest role by providing inmate calling services to less profitable areas that the LECs have otherwise ignored or refused to serve. For example, we have attached as Exhibit 2 some excerpts from the testimony of Randall Ray, the Captain for the Jail Division for the Buncombe County Jail, Ashville, North Carolina.⁷ Mr. Ray states that the local LEC for his facility refused to install inmate-only phones at his facility because, as he was told by the LEC, "it was not economically feasible" (Exhibit 2, page 10, lines 3 through 12.) Thus, prior to independent competition, inmates at the Buncombe County Jail had to be escorted by a guard to a phone located outside the cell block in order to

niche markets that competitive providers have not yet penetrated. For obvious reasons, those providers prefer to remain anonymous rather than attract new competition; thus it is difficult to obtain that information. Most of the manufacturers and distributors with whom we spoke did, however, provide us with a numerical estimate of their customers. We discounted those estimates to take into account that certain inmate calling services providers may have purchased equipment from more than one manufacturer or distributor.

⁷ This testimony was given before the North Carolina Public Services Commission.

KECK, MAHIN & CATE

Olga Madruga Forti
August 19, 1993
Page 5

make a call. (Exhibit 2, page 6-7, lines 22-7.) Needless to say, inmates were not allowed to make many calls under such circumstances.⁸ The fact that independent providers have been willing -- and indeed, have competed against each other -- to provide inmate calling services at areas the LECs have already refused to serve is ample evidence that independent providers will also fill the void in any other markets the LECs chose not to serve as a result of this petition.

A final point to keep in mind is that not only is the present competition in the inmate calling services market robust; the Commission's grant of ICSPTF's petition will only serve as fuel for further competition. Indeed, the underlying purpose of ICSPTF's petition is to promote more competition in the inmate calling services market. As shown in ICSPTF's petition, the LEC's maintain a significant competitive advantage over non-LEC providers by virtue of their ability to treat their inmate services as a regulated activity. By requiring the LECs to account for their inmate-only phones as CPE and for enhanced services related to their inmate-only services outside of regulated accounts, just as the IXCs and other non-LEC providers must do, the Commission will provide competitive balance within the inmate calling services market. This will only serve to encourage additional competition in this market, thereby increasing the availability and quality of inmate calling services -- regardless of whether the LECs choose to remain in the market.

We have also enclosed a recent trade press article on the competition in the inmate-only market which reinforces several of the points we have made here. (See Exhibit 4.) We trust this

⁸ Exhibit 3 shows the counties in North Carolina where the LECs were not responsive to requests to provide inmate-only calling services for certain correctional facilities. Exhibit 3 also illustrates how prior to independent competition in North Carolina, only 3 correctional facilities utilizing LEC equipment had phones that were equipped with the security features necessary to allow unsupervised access. Now, in 1993, there are at least 80 correctional facilities in North Carolina using independent systems, all of which provide state-of-the-art security features that will allow unsupervised phone access.

KECK, MAHIN & CATE

Olga Madruga Forti
August 19, 1993
Page 6

information will be helpful for your purposes. Please feel free to call us if you have any questions about this matter.

Sincerely,

KECK, MAHIN & CATE

By: Albert Kramer
Albert H. Kramer
David B. Jeppsen
Counsel for the Inmate
Services Providers Task
Force

AHK/hlh

Enclosures

cc: James R. Keegan
Suzanne Hutchings

EXHIBIT 1



MCI WIPES OUT ONE OF THE HIGHEST CRIME AREAS IN AMERICA.

MCI Maximum Security is the highest and most sophisticated system of controlling inmate calls in America. It gives the power of the mainframe right to your phone. And it sentences every other system of preventing inmate phone use to obsolescence.

MCI Maximum Security is now introduced to give you total control over calls made out of your prison. Now you can minimize frequently-called numbers, quickly and efficiently. You can call forwarding schemes, credit, and inmate subscription fraud can be reduced much earlier in the game.

Now you can allow a call to go through only if it is

you can stop a call when you want it stopped.

All of this is made possible without any extra equipment, without any additional personnel, and without committing any financial resources from your budget.

That's because MCI Maximum Security is an MCI broad-based system. Its strength and ingenuity is in the size of its mainframe and its reputable network to back it up.

If you need further information, call MCI at 1-800-47-PRISON. You'll discover even more reasons why MCI Maximum Security you've got everything under control.

For more information, call MCI at 1-800-47-PRISON.

MCI

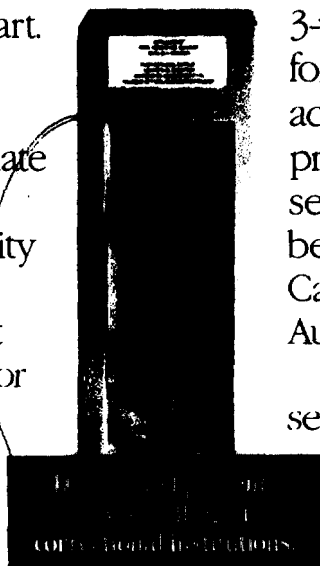
AT&T announces a virtually fraud-proof calling system.

(No three ways about it.)

Your prison population is smart.
But computer engineers are
smarter.

So they've designed our Inmate
Calling Service with multiple
electronic safeguards and security
features. (A series of redundant
systems that combine to make it
nearly impenetrable by inmates or
other unauthorized persons, yet
permit you to supervise inmate
calling patterns—without
detection—and to generate a
variety of administrative and investi-
gative reports.)

This service features an intelligent
system for detecting and preventing



3-way calling, which is responsible
for the lion's share of fraud
activities in most prisons. And it
provides a whole series of other
security systems, from PIN num-
bers, Call Blocking and Sequence
Calling Prevention to Bi-Lingual
Automated Operators and more.

In addition, this highly flexible
service permits you to add
customized features or expand
capacity to meet your institu-
tion's special needs.

So call your AT&T representative at
1 800 KEEP ATT, ext. 204. And get all
the facts about an Inmate Calling Service
that's truly unbeatable.

Try to outsmart the system at the ACA Summer Conference.

Come to Booth 1813-1815 and match wits with the AT&T Inmate Calling Service.



THE ALLIANCE...LONG OVERDUE



Sprint® and

North
American
InTeleCom



A Diamond Shamrock Company



3-WAY BLOCKING

Call conferencing, call forwarding, detection and disconnection.

INMATE MANAGEMENT WITH **COMMAND AND CONTROL PLUS**

Computer color imaging, booking, tracking, classification, trust and commissary.

OPTIONAL DEBIT CALLING WITH **omniphone**

Automatic call processor for inmates' trust account debit calling, with customized features and restrictions.

MINORITY PARTICIPATION

This alliance program incorporates 25-50% minority participation.

***We've put together an
Inmate Phone System
that keeps YOU
in control.***

Total automation with on-site call processing for complete control.

FOR MORE INFORMATION CALL 1 800 546 JAIL

EXHIBIT 2

1 MR. FRUITT:

2 Mr. Chairman, we have four witnesses
3 which I have agreed to call and assist which I
4 would term "public witnesses" and they are all
5 from county law enforcement and the first one
6 I would like to call would be Captain Randall
7 Ray of Buncombe County.

8 RANDALL RAY, Being first duly sworn,

9 Testified as follows:

10 DIRECT EXAMINATION

11 MR. FRUITT:

12 Q Would you please give your name and
13 position, sir, with Buncombe County?

14 A I am Randall Ray. I am Captain of the
15 Jail Division for Buncombe County Jail.

16 Q So you are involved in the jail on a
17 day-to-day basis I take it?

18 A Yes, sir, I am.

19 Q Now, sir, what type of phone service
20 have you historically had in Buncombe County as
21 far as prisoners in the jail?

22 A We had two coin telephones that were
23 located outside of the cell block and close to
24 the jailer supervisor's office. It required us

1 to take inmates out of the cell, sometimes transport-
2 ing them three floors and they made their phone
3 call under the supervision of the jail staff.

4 Q Did they get to make a lot of calls
5 with that procedure, sir?

6 A If they were lucky probably every two
7 weeks.

8 Q Every two weeks?

9 A Yes, sir.

10 Q Now at the present time does Buncombe
11 County have installed E-Z Collect telephones
12 or the IntelliSTAR which has been referred to
13 technology?

14 A Yes, sir, we do.

15 Q Can you please explain to the Commission
16 what impact that's had on the ability of the inmates
17 to make calls and how it has assisted or caused
18 you problems or whatever?

19 A Yes, sir. We had the pay telephones
20 installed in each cell block, of which we have
21 13 that are used actively. The inmates have access
22 to these phones from 5:30 in the morning until
23 11:00 at night, requires no jailer supervision
24 which has released probably 30 or 40 manhours

CAPTAIN JAIL
DIVISION
BUNCOMBE COUNTY

CAPTAIN RAY
RANDALL
BOW

1 a week of supervising phone calls. It has also
2 added to the security of the institution. We
3 had at one time a jailer while he was affecting
4 a phone call for a prisoner had his head split
5 open requiring sixteen stitches. That was because
6 we took the prisoner out of the cell.

7 Q Now you said they were available from
8 5:30 to 11:00 and I guess that is 11:00 at night.

9 A Yes, sir.

10 Q Now do you cut the phones off at that
11 point?

12 A No, sir, the prisoners are locked back
13 in individual cells so they can't physically reach
14 the phone.

15 Q Now with the E-Z Collect phones that
16 you have in your cell blocks now, why did you
17 not just put regular phones in the cell block,
18 regular payphones?

19 A We felt like, first of all, that if
20 coins were available that damage to the phones
21 trying to retrieve the coins would be a possibility.
22 We are also looking at building a new institution
23 and at that time we will not have any money in
24 the jail.

1 Q So, in other words, you are trying to
2 get away from coins in the prison system?

3 A We will be doing away with them, yes,
4 sir.

5 Q Now is there a problem with the traditional,
6 what we think of as coin telephone as far as the
7 ability of an inmate to get a live operator?

8 A Yes, sir.

9 Q What is the problem that if the inmate
10 can get a live operator through a traditional,
11 what we think of as coin telephone?

12 A We have had prisoners who sold a credit
13 card number to other prisoners and we have had
14 people who called and said they had several hundred
15 dollars worth of phone calls billed to them that
16 they were not responsible for.

17 Q Is what you are saying is if the prisoners
18 can get a live operator, the chances of fraud
19 are increased dramatically as far as the confinement
20 center, sir? Is that effectively what you are
21 saying?

22 A Significantly, yes, sir.

23 Q Did you go to---let me ask you this.
24 Who is your local telephone company provider in

1 Asheville?

2 A Southern Bell.

3 Q Southern Bell. Did you approach Southern
4 Bell and ask for assistance on coming up with
5 some mechanism where you could have phones more
6 readily available to the prisoners in the cell
7 blocks?

8 A Yes, sir, we did approximately six years
9 ago, we contacted them. They sent a representative
10 up and he said there was no way they could do
11 anything, it was not economically feasible for
12 them to put phones in.

13 Q Now with the E-Z collect telephones,
14 am I correct they do not require any coins?

15 A No, sir, they do not.

16 Q And are they collect-only, sir?

17 A Yes, sir, they are.

18 Q Can they be programmed so that an inmate
19 cannot get a live operator also?

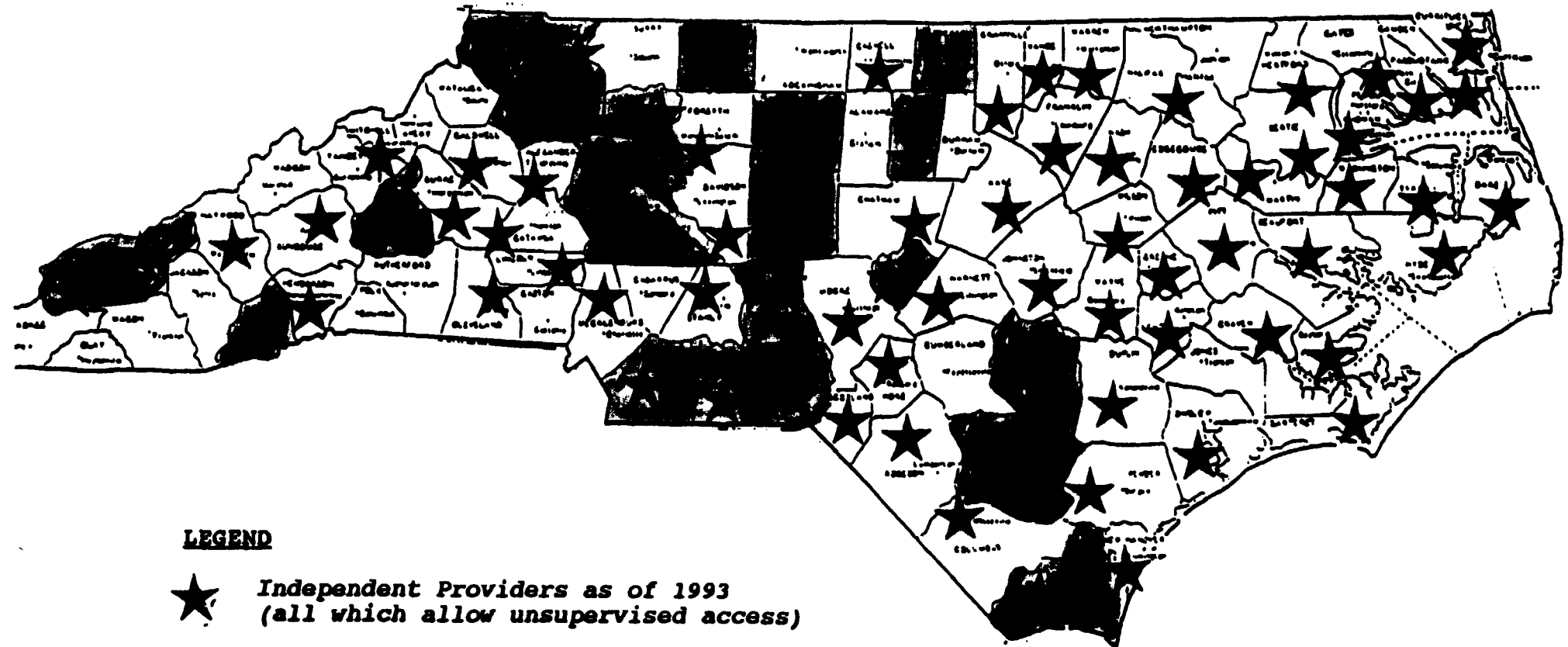
20 A They have been done that way, yes, sir.

21 Q Are the phones in your installation
22 programmed so that the inmates do not get a live
23 operator?

24 A That is correct.

EXHIBIT 3

NORTH CAROLINA CORRECTIONAL FACILITIES



LEGEND



*Independent Providers as of 1993
(all which allow unsupervised access)*




*Correctional Facilities Providing
Unsupervised Phone Access Prior to
Independent Competition in 1989*



*Correctional Facilities Which
The LECs Were Not Responsive
In Providing Inmate-only Services*

EXHIBIT 4



Competition for inmate calling service contracts is at a fever pitch. More and more suppliers are hoping to cash in on the market's unflinching need for virtually fraud-free call processing. Initially, the lucrative promise of the market gave rise to many independent service providers, such as Correctional Communications Corp., Pay-Tel of America, Robert Cefail & Associates and Tel-America Correctional Communications, which have targeted corrections exclusively. RC&A, for one, now runs 2,500 phones for more than 160 county, state and federal facilities nationwide.

Over the past two years, the success of private providers at preventing fraud, increasing revenues, managing inmate phone use and detecting criminal activity has fueled demand for such services by most institutions, including the Federal Bureau of Prisons, and a renewed interest in inmate calling services by technology and service providers.

Opticom, an Indiana-based operator services provider, has increased its marketing efforts toward facilities and inmate calling system vendors in the last six months. The OSP now captures default traffic at the Lorton Penitentiary in Virginia and is the sole provider of automated and live operator services to Marion County Jail in Indiana.

Two other notable entrants to the market in 1991 were US Sprint and AT&T, each of which has teamed with a manufacturer to offer both transmission of long distance calls and the call restrictions and management features of premise-based technology.

The Only Thing



However, nowhere is the need for greater control in the inmate marketplace validated more than in the Bell Operating Companies' migration to specialized call processors in an effort to retain their entrenched base of correctional clients.

Bell Atlantic, for one, is conducting five trials of set-based and PC-based inmate calling systems in jails and prisons in its region. A spokesperson for the company said based on the success of the technology thus far, deployment likely would continue throughout the region. Ameritech also expects the technology to be pervasive in its region. So far 29 institutions, or about 10 percent of its customer base, has been sold on the capabilities of the Science Dynamics and Tele-Service products the firm's Ameritech Services, Inc., subsidiary sells into the corrections market.

Southwestern Bell also is deploying the Tele-Service 4010R+ set-based product and the Science Dynamics CO-based product. Currently, half of the inmate facilities served by the telco are using the technology. Ultimately, all institutions with 10 phones and more will be using it, said Kelvin Johnson, product manager for public communications.

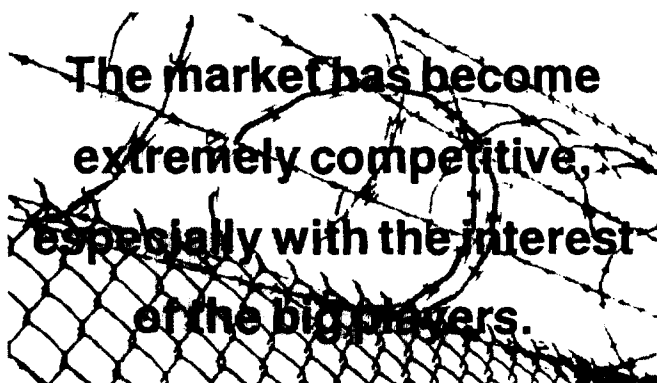
NYNEX offers a CO-based calling system, as do Pacific Bell and BellSouth.

One company providing equipment for the regulated side of the corrections market is Lakeland, Fla.,-based Protel, Inc., which manufactures the 3000

Series Coinless Inmate Smart Paystation—it can be used stand-alone or interfaced to "ExpressNet," Protel's management software—and the 1000 Series Inmate Telephone. The 1000 series is CO-based, but is designed to meet the specific security needs of correctional institutions.

Bigger, Smarter, Faster

Not only are the number and strength



of the players increasing, so is the technology. "The market has become extremely competitive, especially with the interest of the big players," says Rich Dewitt of Tel-America Correctional Communications. "It's got to come down to the best approach."

Gone are the days when administrators are content with automated collect-only calling. PIN numbers, call monitoring, pre-approved number lists, centralized administration and debit systems are gracing many requests for proposals. (Whether the features actually are used is another story. But it is a sign to vendors that corrections administrators are becoming more savvy about the capabilities of the systems in the market and

don't want to lock themselves into a solution that may not grow with the changing requirements of the facility.)

The Enforcer by OPUS Telecom, Framingham, Mass., is one inmate call security control and billing system which offers facilities their choice of options from the same PC-based platform. Using the same equipment and varying the software, an institution can

opt for a live operator collect-only, automated operator collect-only, automated operator collect with PINs or debit/commissary fund systems.

The Enforcer system, selected by the Federal Bureau of Prisons to provide inmate calling services via a debit/commissary fund in more than 100 federal prisons, is just one of a growing number of premise-based solutions for the market. (See suppliers directory on page 38.)

It used to be that one easily could categorize the systems as board-based, PC-based and switch-based, but many hybrids now are making their way to the market, particularly board-based systems that are enhanced by PC-based functionalities. Omniphone, Mobile, Ala., for example, formally introduced its Omniguard product in July. Developed in March 1990, Omniguard adds a file server and PC host to the Defender board-based line controllers for a totally redundant system.

Explaining the 2-year delay in commercial introduction of Omniguard, Omniphone's Les Barnett said it was developed at the request of customers

Tougher Than Inmate Phone Systems Is The Competition

By Khali Henderson, Contributing Writer

trying to answer demanding RFPs, but the company was not asked to supply it. The increased interest in more complex operations, such as PINs and debit/commissary make Omniguard's larger memory more attractive in today's marketplace, he added.

The distributed architecture approach also has been used by Intellcall, Carrollton, Texas, with its Check★Mate product and Tele-Matic, Englewood, Colo., with its Con-Quest Inmate Control System. Tom Huzjak, president of Tele-Matic, calls it a "fail-safe system architecture."

"Because the system uses smart phones enhanced and supported by host processors, a central processor failure does not cause system disruption. Calls continue to be processed in the event the host or host connection fails. Each phone operates on a stand-alone basis in the event of a failure, with minimum feature loss," he said.

Another increasingly common enhancement to many of the set-based or single-line controllers is the administrative workstation for the correctional facility. Omniphone's CellBlock, for example, enables a vendor to offer the institution direct access to real-time call detail records and the ability to assign PINs and update call lists via an on-site computer workstation.

Multiple on-site call processors also can be networked for a centralized administration point. For example, Science Dynamics, Cherry Hill, N.J., offers control and administration of up to 24 Call Control Timing Device database workstations from one location via its CCTD Centralized Administration System. The centralized workstation provides remote access to each database workstation, collects call detail records and transfers data to storage. As an option, the on-site database workstations can operate without a monitor or keyboard for exclusive access and control by the central workstation.

Designed for central office-sized capacities of 64 lines and up, Science Dynamics' CCTD has found popularity among the RBOCs—all seven of which are using CCTD in some manner. In an effort to broaden its market appeal, in much the same manner as the low-end vendors have enhanced their products, Science Dynamics introduced in July the CCTD Single Shelf for appli-

cations using fewer than 64 lines. The CCTD SS with a workstation is geared toward 20 to 64 lines, but stand-alones can accommodate installations with less than 20 lines.

"We have found a lot of interest from customers in keeping to one kind of system. The CCTD SS enables our regulated clients to deploy the technology in the network anywhere it makes sense for them, from the CO to the premise," explained Jim Campanozzi, vice president of sales and marketing for Science Dynamics.

For large centralized solutions, some vendors are turning to switch-based systems for inmate calling

services. The Harris Protocol system is being used by Tel-America in the Wayne County Jail in Detroit and in the New Orleans Parish. Sprint's initial foray into premise-based inmate call processing employs a Hitachi HCX 5000.

In both cases, the advantages of the switch-based system were greater capacity, combined administrative and inmate calling and capability for advanced features such as video arraignment to be run on the same switch. (See related story on page 32).

A PBX also has been used as a way to concentrate lines, under the theory that not all phones will be used at once. According to Jim Burton of TELEQUIP Labs, the identity of the calling telephone instrument can be lost by using an external PBX. Using an Integrated Concentrator Facility, TELEQUIP's processor enables lines to be concentrated to a ratio as low as 2-to-1.

Now that inmate calling patterns are

known, many inmate calling service providers are moving to concentrated lines, where allowable by the state, to reduce costs of monthly line charges. With the ICF, says Burton, they also can save 25 percent on equipment (fewer processors per line) and the cost of a PBX.

Features & Benefits

While configurations vary and the merits of each are debated by manufacturers and suppliers, as long as they can step up to the task, where the intelligence lies is inconsequential to most facilities.

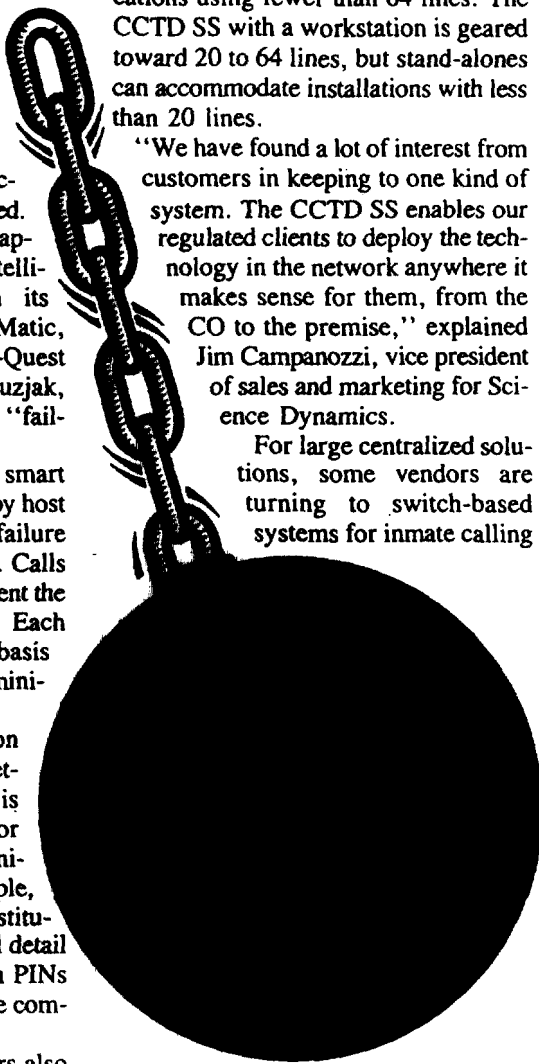
In general, facilities say they want a system that controls inmate calling, works well and consistently, is easy to administrate, tracks inmate calls and returns some revenue to the inmate recreation funds.

Automated operator collect-only systems are the most commonly deployed, particularly in county jails and institutions where confinements are short. The primary benefits to the facility are that inmates are provided telephone service; only they can make collect calls so there is no administration of a commissary fund; and there are basic fraud prevention features. By adding PIN numbers to an automated operator system, a slightly larger or longer-term facility can gain increased control over individual inmate calling patterns and more specific information for investigation of criminal activity conducted via phone.

More and more, however, large unbillable collect charges are prompting some larger institutions to opt for a direct-dialed debit system. The Federal Bureau of Prisons has chosen to use a commissary fund method by OPUS Telecom for its federal penitentiaries. Likewise, the Colorado Department of Corrections has migrated to a debit system using Sprint's SafeBlock product in its 14 facilities statewide.

According to Christie Poole, telecom manager for the Colorado DOC, in addition to limiting uncollectibles, the debit system fits better with the prisons' overriding goals for rehabilitation by placing the financial responsibility for the call with the inmate, not the called party.

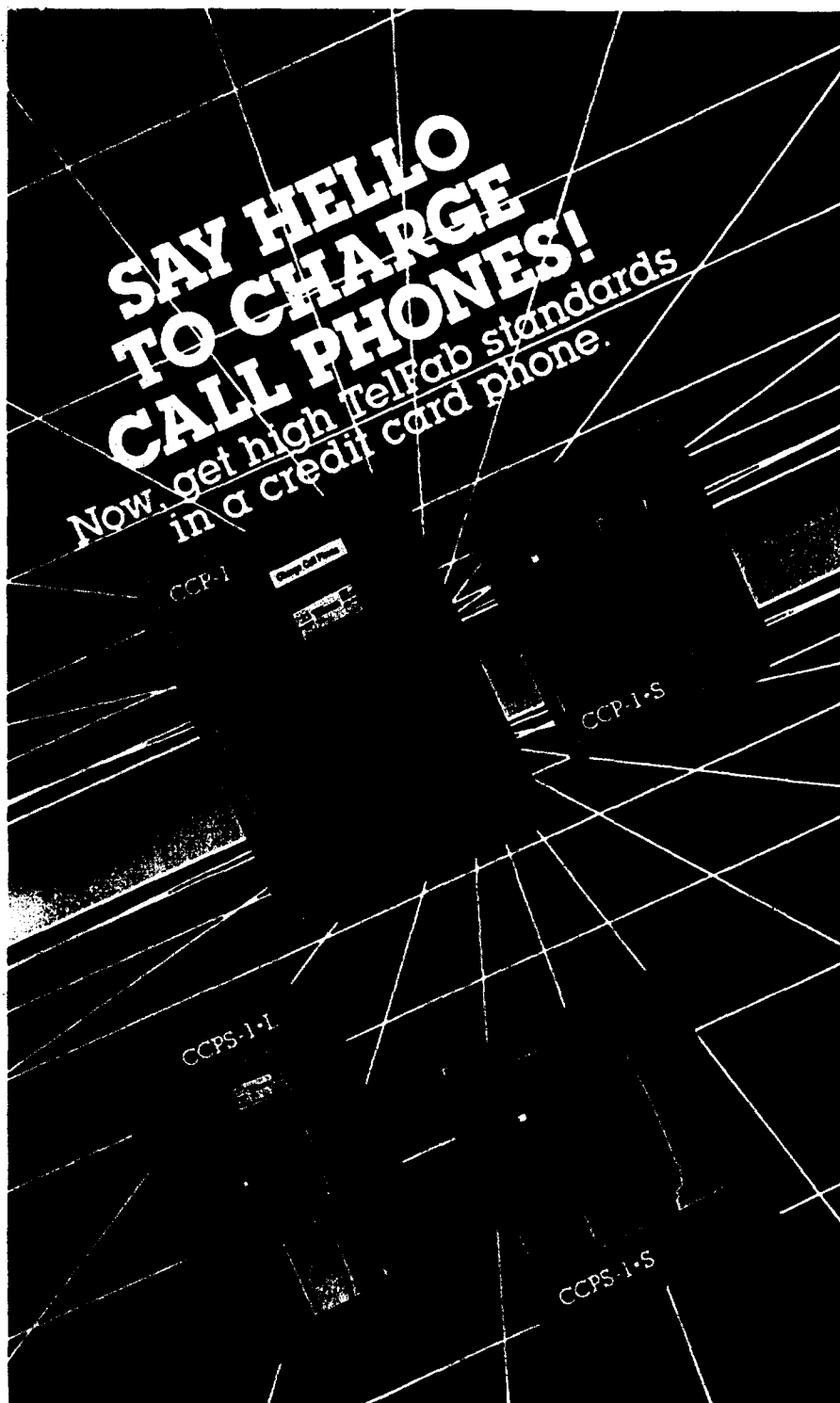
With the direct-dial system, the inmate also will have to pay upfront to defraud the system—an added deterrent, Poole said. She said this system foils the burnt-out phone scenario where inmates often would call free by setting





SAY HELLO TO CHARGE CALL PHONES!

Now, get high TelFab standards
in a credit card phone.



Say hello to the future of credit card phones from TelFab.

The same high quality engineering and high standards in production you've come to expect in our enclosures is yours in our credit card telephones.

Compare and see ... or hear for yourself. Our guarantee is your complete satisfaction.

Call today for details ... and to say hello!

FOR MORE INFORMATION CALL TOLL FREE 1-800-828-6816

TELFAB INC.
ENGINEERED COMMUNICATION PRODUCTS

Corporate Offices:
P.O. Box 388
Willoughby, Ohio 44094
Phone: (216) 442-0059
FAX: (216) 946-7922

up service with the phone company at a bogus address and then having the calls forwarded to an accomplice's number. The inmates have no intention of paying the bill, and there is no way to trace call origin.

Beyond the basic configuration, the call screening features are virtually endless. Some common ones are:

- Global call blocking;
- Call length limits;
- Phone shutdown;
- PIN numbers;
- Pre-approved numbers by PIN;
- Blocked numbers by PIN;
- Blocked numbers by phone;
- Call monitoring;
- Call alert;
- Pre-call announcements; and
- Positive collect call acceptance.

Another feature, three-way calling detection, has been touted of late by several manufacturers, including Tele-Matic and Global Tel*Link, as a way to terminate calls that are transferred to unsuspecting third parties by an accomplice whose phone is equipped with three-way calling capabilities. Correctional facilities are eager to use the feature, but most suppliers say the technology is not foolproof. (See story on page 36).

TELEQUIP Labs has introduced a new feature eliminating the ability of two inmates to call the same number simultaneously, thus preventing possible intercoming of two inmates via a third-party's office phone. Called Intercom Prevention Control, the feature will not allow a number to be dialed while a call to that same number is connected.

Correctional Communications Corp., San Ramon, Calif., has added a feature to its customized call processing system, Auto Inmate Payphone System, that will allow calls from the public defender into a facility's PBX to be transferred to the inmate telephone in the cell area. The AIPS processor interfaces with the PBX to handle the transfer—a feature which allows the public defender to contact the inmate without visiting the premise.

Another feature by Tele-Matic prevents inmates from sending messages to the called party when setting up an automated collect call by talking when prompted for the caller's name. The prerecorded voice insertion feature prevents short, unpaid and uncontrolled messages from being sent. ☎